

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 OFFENSE CHARGED SUPERSEDING

18 U.S.C. § 2422(b) - Coercion and enticement of a minor

Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

SEE ATTACHMENT TO PENALTY SHEET

+

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

HSI - Homeland Security Investigations

person is awaiting trial in another Federal or State Court,
 give name of court

this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprocution of
 charges previously dismissed
 which were dismissed on motion
 of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.
 }

this prosecution relates to a
 pending case involving this same
 defendant

prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

MAGISTRATE
 CASE NO.
 }

Name and Office of Person
 Furnishing Information on this form ISMAIL J. RAMSEY

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) EVAN M. MATEER

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: NO BAIL

* Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

→ AIDAN PATRICK WORLEY

DISTRICT COURT NUMBER

4:23-mj-71006-MAG

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior
 summons was served on above charges → _____

2) Is a Fugitive3) Is on Bail or Release from (show District)

FILED

Jul 07 2023
 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND

IS IN CUSTODY

4) On this charge5) On another conviction6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed _____

DATE OF
 ARREST →

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY →

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Bail Amount: NO BAIL

* Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

ATTACHMENT TO PENALTY SHEET

Maximum Penalties:

18 U.S.C. § 2422(b):

- Maximum prison term: 20 years' imprisonment
- Minimum prison term: 10 years' imprisonment
- Supervised release: Lifetime (max) to 5 years (mandatory min)(18 U.S.C. 3583(k))
- Maximum fine: \$250,000 fine (18 U.S.C. § 3571(b)(3))
- Restitution: Determined by the Court (18 U.S.C. § 3663(a)(1))
- Mandatory special assessment: \$5,100 special assessment (typical \$100 special assessment under 18 U.S.C. § 3013 and an additional \$5,000 special assessment under 18 U.S.C. § 3014(a)(3) because the crime relates to sexual exploitation of children).

UNITED STATES DISTRICT COURT
for the
Northern District of California

United States of America

v.

AIDAN PATRICK WORLEY,

)

)

)

)

)

)

Case No.

4:23-mj-71006-MAG

*Defendant(s)***FILED**

Jul 07 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2020 in the county of Alameda in the
Northern District of California, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2422(b) Coercion and enticement of a minor

This criminal complaint is based on these facts:

See attached Affidavit of Alexa Leisure, a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI)

Continued on the attached sheet.

/s/ Alexa Leisure

Complainant's signature

HSI Special Agent Alexa Leisure

Printed name and title

Approved as to form Evan M. Mateer
AUSA Evan M. Mateer

Sworn to before me and signed in my presence.

Date: 07/06/2023


Judge's signature

City and state: San Francisco, California

Hon. Alex G. Tse, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Alexa Leisure, a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) in San Francisco, California, being duly sworn, depose and state as follows:

INTRODUCTION

1. I submit this affidavit in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a criminal complaint and arrest warrant authorizing the arrest of **AIDAN PATRICK WORLEY (WORLEY)** for one violation of Title 18, United States Code § 2422(b), coercion and enticement of a minor on or about and within June 2020, in the Northern District of California.

SOURCES OF INFORMATION

2. This affidavit is submitted for the limited purpose of securing a criminal complaint and arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts necessary to establish probable cause that violations of the federal law identified above have occurred.

3. I have based my statements in this affidavit on my training and experience; personal knowledge of the facts and circumstances obtained through my participation in this investigation, information provided by other agents and law enforcement officers, and information provided by records and databases. I believe these sources to be reliable. Where I refer to conversations and events, I refer to them in substance and in relevant part rather than in their entirety or verbatim, unless otherwise noted. This affidavit reflects my current understanding of facts relating to this investigation, but my understanding may change in the future, as the investigation is ongoing.

AFFIANT BACKGROUND AND EXPERIENCE

4. I have been employed as a Special Agent (SA) of the U.S. Department of Homeland Security (DHS), Homeland Security Investigations (HSI), since February 2021 and am currently assigned to Special Agent in Charge San Francisco. While employed by HSI, I have investigated or assisted in the investigation of federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography.

5. I have gained experience through completion of the Criminal Investigator Training Program and HSI Special Agent Training at the Federal Law Enforcement Training Centers (FLETC) in Glynco, Georgia. I have also completed everyday work related to conducting these types of investigations. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256), including in computer media.

APPLICABLE STATUTES

6. Title 18, United States Code, Section 2422(b) states that whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States [whom] knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so.

FACTS ESTABLISHING PROBABLE CAUSE***Background Summary***

7. In June 2020, WORLEY engaged with two minor victims on Snapchat, soliciting both nude photographs and video calls consisting of sexual acts. During the video calls,

WORLEY recorded the sexual acts and threatened to expose the minor victims if they did not comply with his demands: more nude photographs, recordings, and explicit live video calls.

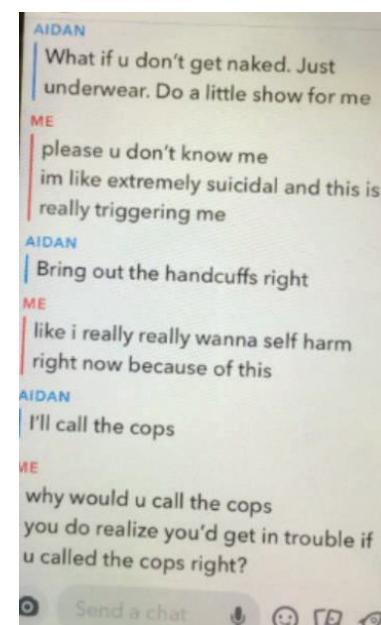
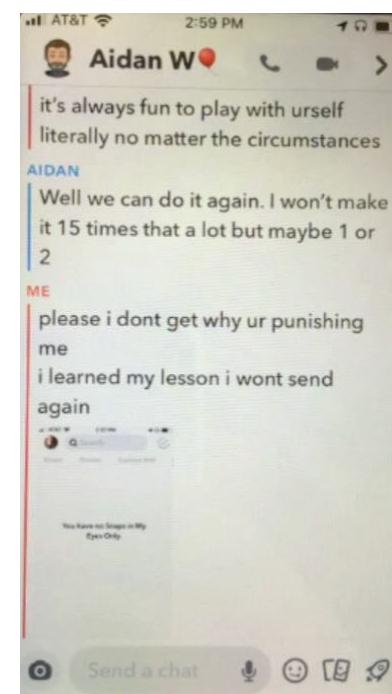
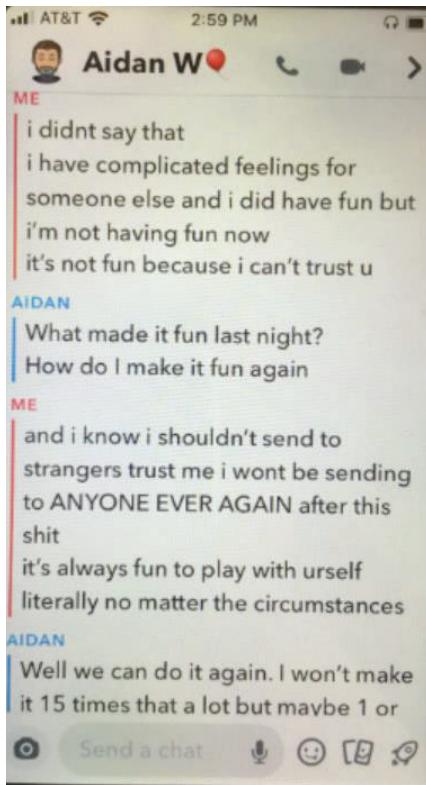
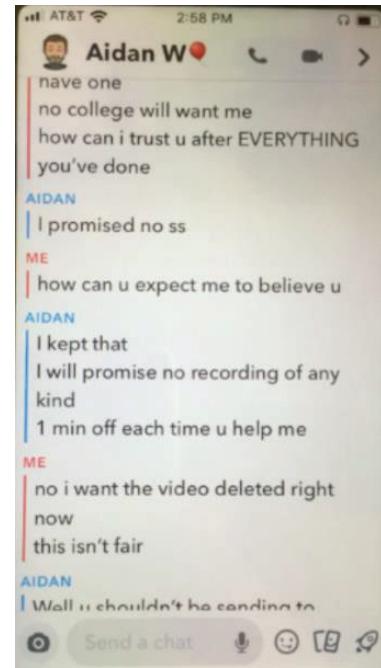
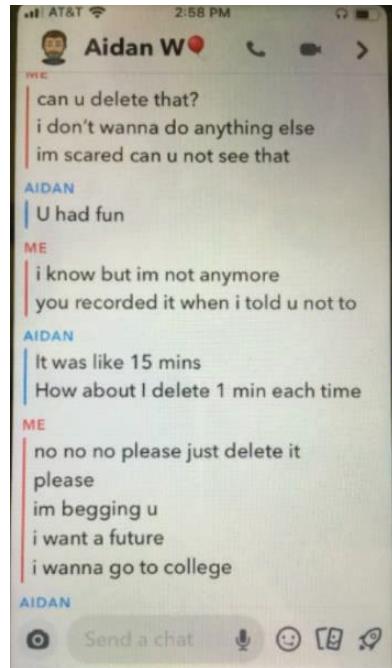
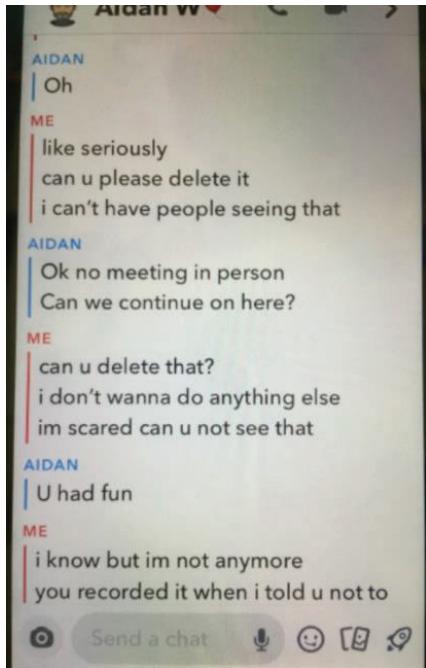
8. Subscriber information for the snapchat accounts identified by the minor victims are associated with WORLEY by email address, phone number, and IP addresses used to access the account. In August 2022, state investigators served a search warrant on WORLEY's residence and person recovering the cellphone WORLEY used to engage with the minor victims. On that cellphone, law enforcement observed multiple photographs of child sexual abuse material.

Minor Victim 1

9. On or about April 14, 2021, San Francisco Police Department (SFPD) Sergeant and HSI Task Force Officer (TFO) Brian Kelly received CyberTipline Report 87962307 from the National Center for Missing and Exploited Children (NCMEC). The Cyber tip, reported by a minor victim (MINOR VICTIM 1/MV1) on March 23, 2021, stated MV1 sent "explicit content" to an unknown suspect who "blackmailed" MV1 into "doing explicit things on videos calls." MV1 stated she is "underage." MV1 did not provide any further information and did not provide any suspect information. Through law enforcement databases, Sergeant Kelly identified and located MV1 in San Francisco, verified MV1 is a minor, and contacted MV1's parents.

10. On or about June 29, 2021, MV1 participated in a follow-up forensic interview. MV1 explained that the incident occurred in June 2020. MV1 initially messaged with Aidan Patrick WORLEY on the social media application, Spotafriend, where MV1 and WORLEY exchanged Snapchat usernames. MV1 and WORLEY then exchanged messages on Snapchat where WORLEY demanded nude photographs of MV1. MV1 stated she sent WORLEY fully nude photographs.

11. MV1 stated WORLEY also demanded a live video call through Snapchat and told MV1 he would post the photographs on Instagram if MV1 did not comply. MV1 joined a live video call with WORLEY where WORLEY directed MV1 to be nude and to insert a hairbrush handle into MV1's vagina. WORLEY told MV1 he would masturbate during the video call and direct MV1 to perform sexually explicit acts. MV1 stated she heard WORLEY masturbating during the incident. WORLEY said he recorded the live video calls with a second cell phone and MV1 saw the second cell phone during the live video call. MV1 said the hairbrush handle made her vagina bleed and she cried during the incident. MV1 stated she participated in three (3) different live video calls on Snapchat with WORLEY in June 2020. MV1 stated she felt forced to participate in the live video calls because she did not want WORLEY to post the photographs and/or videos on social media. MV1 also wanted WORLEY to delete the nude photographs and possible videos. Examples of the video chats recorded by MV1 with her iPod Touch are reproduced below.



12. WORLEY posted a nude photograph of MV1's nude buttocks on WORLEY's Snapchat "Story." MV1 told WORLEY to delete the nude photographs and videos but WORLEY refused. MV1 told WORLEY that MV1 is fifteen (15) years old, and WORLEY told MV1 he is eighteen (18) years old. MV1 saw WORLEY and described him as "overweight" with brown hair and "stubble" on his face.

13. MV1 identified two (2) Snapchat accounts associated with WORLEY with which MV1 exchanged chats. MV1 identified the first Snapchat account with the display name, "Jack Lucas." From my training and experience, I know that Snapchat display names are different than Snapchat usernames and can be changed at any time by the user. MV1 did not know the Snapchat username for the first Snapchat account. MV1 identified the second Snapchat account with the Snapchat display name "Aidan W" and Snapchat username "qwertystudent4." MV1 also provided her Snapchat username.

14. MV1 used Snapchat on her Apple iPhone cell phone and took photographs of the Snapchat conversations with WORLEY using her Apple iPod Touch. On or about August 16, 2021, MV1 provided the Apple iPhone cell phone and Apple iPod Touch to Sergeant Kelly. MV1 and her parents provided written permission to search both devices.

15. Investigators performed a data extraction on the Apple iPod Touch. Sergeant Kelly located the photographs of the Snapchat conversations between MV1 and WORLEY, which confirmed the information MV1 provided in the forensic interview. Sergeant Kelly also located a nude photograph of MV1 that appeared to match the description of the photograph posted to WORLEY's Snapchat "story." MV1 did not recall the passcode to the Apple iPhone cell phone. Forensic software has continually attempted to unlock the Apple iPhone cell phone but has been unsuccessful thus far. A partial data extraction was performed on the Apple iPhone

cell phone that allowed Sergeant Kelly to locate the Snapchat application installed on the Apple iPhone but not the Snapchat message thread with WORLEY.

16. On or about November 18, 2021, Sergeant Kelly obtained and executed a search warrant to Snap Inc. for MV1's Snapchat username and WORLEY's Snapchat username, qwertydoctor4. The search warrant was signed by the Honorable Judge Harold Kahn in Department 505 of the Superior Court of California, County of San Francisco. The search warrant return for WORLEY's username, qwertydoctor4, confirmed the Snapchat display name "Aidan W" and provided the registered email and phone number associated with the account, qwertydoctor4@gmail.com and phone number ending in 0796, respectively. Snap Inc. provided a list of login and logout IP Addresses utilized by the account, including Comcast Cable Communications IP Address, 98.42.104.34. The geolocation for the IP Address is near WORLEY's home in Livermore, CA.

17. I know from my training and experience that Snapchat is a mobile social media application made by Snap Inc. and available through the iPhone App Store and Google Play Store. The Snapchat application uses the internet and provides users a way to share moments with images and videos which are referred to as "Snaps." Users can post "Snaps" to a chronological collection of "Snaps" displayed as a "Story" for other users to view. Users can also communicate and share "Snaps" through chats. Generally, once a "Snap" has been opened by all recipients, the content is permanently deleted and unavailable. If a "Snap" is unopened by one or more recipients, it may remain on our servers for up to thirty (30) days. A "Snap" that has been posted to a user's "Story" can be viewed for up to twenty-four (24) hours. Typically, the posted "Snap" is permanently deleted and unavailable twenty-four (24) hours after being posted to their "Story." Chat content will typically only be available if the sender or recipient has

chosen to save the Chat. "Memories" content may be available until deleted by a user. Based on the user settings and the user selections, images and videos also known as "Snaps" may or may not be saved within the Snapchat account.

18. Sergeant Kelly located one (1) chat message from jacklucas2005 to MV1's Snapchat username on Thursday, June 25 22:10:34 UTC 2020. There was no content in the message. Based on MV1's statement that WORLEY's initial Snapchat account had a display name of "Jack Lucas," it appears that the username for this Snapchat account is jacklucas2005. The Snap Inc. search warrant returns for both usernames did not contain the messages or child sexual abuse material (CSAM) MV1 exchanged with WORLEY.

19. On or about January 1, 2022, Sergeant Kelly obtained and executed a search warrant to Snap Inc. for WORLEY's additional Snapchat username, jacklucas2005. The search warrant was signed by the Honorable Judge Sharon M. Reardon in Department 28 of the Superior Court of California, County of San Francisco. The Snap Inc. search warrant return indicated the Snapchat account, jacklucas2005, was created on June 17, 2020, and confirmed the display name for the account was "Jack Lucas" from June 17, 2020, to June 23, 2021. The registered email address for the account was jakepratt18@gmail.com.

20. Sergeant Kelly did not locate any photographs or videos of MV1 within the jacklucas2005 account. The account did not contain the messages or CSAM that MV1 exchanged with WORLEY. Sergeant Kelly observed other nude photographs and videos of females and males contained within the jacklucas2005 Snapchat account.

21. Sergeant Kelly located one (1) chat message from jacklucas2005 to MV1's Snapchat username on Thursday, June 25 22:10:34 UTC 2020, as identified in MV1's Snapchat account. There was no content in the message. Sergeant Kelly located other chat messages

within the jacklucas2005 that were possible child exploitation messages with other Snapchat users. The conversations were sexually explicit, and the context of the messages indicated that they may have been with minors, but investigators were only able to identify and confirm the age of one victim, identified as Minor Victim 2 (MV2) below.

Minor Victim 2

22. Within the search warrant return for Snapchat username jacklucas2005, Sergeant Kelly found messages exchanged between a second minor victim's, (MV2's) username and jacklucas2005 (WORLEY). The messages were sexual in nature and one message sent from MV2 to jacklucas2005 (WORLEY) read, "Also if u do u can be charged for child porn". The message was sent by MV2 in response to a message sent by jacklucas2005 (WORLEY) that read, "So many boys would pay to see". These messages were exchanged on June 21, 2020, between 7:06 and 7:07 UTC.

23. Snap Inc. provided a recent IP Address History log that recorded the events associated with the Snapchat account jacklucas2005. The IP Address 98.42.104.34, identified in the jacklucas2005 Snapchat account, was also an IP Address used to access the qwertydoctor4 Snapchat account multiple times.

24. Sergeant Kelly conducted a search on an open source and publicly available website for MV2's full name and identified a juvenile female located in Rancho Cordova, California, whose photographs matched the female in the Snapchat photographs for MV2's Snapchat username. Using law enforcement databases, Sergeant Kelly was able to identify a possible parent for MV2. Sergeant Kelly contacted MV2's father by telephone and confirmed MV2's identity. MV2's father was aware of the incident that took place between MV2 and WORLEY in June 2022. MV2's father agreed to let MV2 participate in a forensic interview

with law enforcement.

25. On or about September 14, 2022, at approximately 1:00 PM, a forensic interview was conducted by Darla Garcia, Forensic Interview Specialist with the Special Assault Forensic Evaluation Center in Sacramento County. The interview was observed by Sergeant Kelly, HSI TFO SFPD Sergeant Nick Hillard, and other ICAC members. MV2 stated the incident occurred in late June 2020. MV2 met WORLEY on an application to make friends, possibly called, "Just Friends." MV2 stated she told WORLEY she was thirteen (13) years old, and WORLEY told MV2 that he was sixteen (16) years old. MV2 stated WORLEY then transitioned the message communication with MV2 to Snapchat. MV2 said WORLEY's Snapchat username was possibly "jacklucas06." WORLEY requested nude photographs and "guilted" MV2 to send nude photographs. MV2 said she sent nude photographs to WORLEY and WORLEY sent photographs of WORLEY's penis and WORLEY masturbating to MV2.

26. MV2 stated WORLEY requested to video chat and MV2 declined. WORLEY then threatened to send the nude photographs to MV2's friends if MV2 did not send more nude photographs or nude videos. MV2 received screenshots from WORLEY of MV2's nude photographs. MV2 thought WORLEY used a cell phone and a computer to screenshot MV2's nude photographs. MV2 sent additional nude photographs to WORLEY as well as videos of MV2 masturbating at the direction of WORLEY. WORLEY also coerced MV2 into video calls where WORLEY and MV2 performed sexual acts. Examples of the Snapchat messages exchanged between WORLEY and MV2 are reproduced below, with messages from WORLEY in grey and those from MV2 in white.

Do u wanna vodeochat	Idk why u can't do that on videochat. It was kinda a turn off	No talking from your side. The second u don't listen I leave. And it's until I cum. Shouldn't be more than 5 mins if u listen
Noooo	I'll mutemysel if u wang	Nothing extreme tho
Why baby	Fine u don't want to be risky. Don't want to be fun	Like it isn't make hella noise
I want to watch u play with urself	Sorry if I pressure u	Ok tell me when ur ready
I hate video chats just send videos	Idc	And after I want a screen recording of u going through ur camera roll so ik u dont have them
Baby u can't be self conscious with me	I dont want to do a video call that's final its not gonna change sorry if that's a turn off for u	Deal
Lol thinking ur unattractive is unattractive	I have one thing that will change ur mind	Ready?
Oh	What's that	Hang on
Ur perfect and I don't want u shy with me	Everything u sent I have recorded and saved. Idgaf and will sell that shit in a heartbeat	Wtf
I want to see ur wet pussy	Idc ur a dick connection my ass	Don't mute urself
I want u to see my dick cum because ur so hot	If u ever want a girl u might wanna learn respect	It gets in the way
I want us to have fun on videochat	Such a hot girl	I can't see u
Please	So many boys would pay to see	Hello?
No		I can't see u
How about this		Send proof
We send vids		I need to clean up
And when I'm about to cum u just show ur face on videochat		Fine
Orrrr I can send u videos and then a pic of me		Did u like that?
I want u to watch me. I want to see your tongue and your reaction when I do it		Please delete them
Baby....		I'll say anything u want me to
Nooo		

27. Sergeant Kelly conducted a computer query in law enforcement databases for the phone number ending in 0796, the registered phone number associated with Snapchat account qwertydoctor4 and display name “Aidan W.” The search revealed identifiable information for Aidan WORLEY, DOB: 2000, CA Driver License 84 with a current address of , Livermore, CA 94550. The CA Driver License photo for Aidan WORLEY matched the age and suspect description that MV1 provided.

28. Sergeant Kelly conducted a computer query in law enforcement databases for family members and addresses associated with Aidan WORLEY. The search identified WORLEY’s father with a current address at another location in Livermore, CA.

29. On or about August 3, 2022, Sergeant Kelly obtained search warrants to Sprint Corporation for phone number ending 0796, and to Google LLC for the Gmail account, qwertydoctor4@gmail.com. The search warrants were signed by the Honorable Judge Loretta M. Giorgi in Department 20 of the Superior Court of California, County of San Francisco. Sergeant Kelly executed the qwertydoctor4@gmail.com search warrant and SFPD Officer Perez

#660 executed the Sprint Corporation search warrant through T-Mobile for the phone number ending 0796. The Sprint Corporation search warrant for the phone number included a request for L-Site Precision Location Data (pings).

30. The search warrant return provided by Google LLC for Gmail account qwertydoctor4@gmail.com provided minimal subscriber information, including the name, “doctor Qwerty” and the birthdate May 15, 1976. One (1) email was found from Snapchat that confirmed the Snapchat username was changed from qwertydoctor4 to aidanpworley.

31. Surveillance of the address listed on WORLEY’s driver’s license, 1480 Frankfurt Way, Livermore, CA 94550, revealed that the location is vacant. Surveillance of the address associated with WORLEY’s father at the other Livermore, CA location, revealed a red mustang (CA/ 50) parked in front of the address registered to “Aiden Worley” at the address associated with WORLEY’s father in Livermore, CA. On or about August 15, 2022, surveillance confirmed that Aidan WORLEY exited the white entry door to the left of the garage at the Livermore, CA address associated with his father.

32. The search warrant return provided by the Sprint Corporation through T-Mobile for phone number ending 0796, identified Account Billing information for WORLEY’s father with an address in Livermore, CA associated with WORLEY’s father where law enforcement previously surveilled WORLEY. A recent computer query in law enforcement databases revealed an updated CA Driver License address for Aidan WORLEY with the Livermore, CA associated with his father as of June 3, 2022.

33. Sergeant Kelly obtained a search warrant for the residence and the person of Aidan WORLEY. The search warrant was signed by the Honorable Judge Brian L. Ferrall in Department 11 of the Superior Court of California, County of San Francisco.

34. On or about August 19, 2022, law enforcement executed the search warrant and arrested WORLEY. Law enforcement seized multiple electronic devices including an Apple iPhone 13 from WORLEY's bedroom and a Google Pixel cell phone concealed in the shoe Aidan WORLEY was wearing.

35. SFPD Sergeant Hillard and Sergeant Kelly conducted a Mirandized and recorded interview with WORLEY. WORLEY provided biographical and contact information which included the phone number ending 0796 and email address @gmail.com. The phone number ending in 0796 is the same phone number associated with the Snapchat account qwertydoctor4.

36. During the interview WORLEY stated he did not recall the incident MV1 reported. Sergeant Kelly showed WORLEY a photo of MV1, and WORLEY stated he did not recognize MV1. WORLEY did not recall the Snapchat usernames jacklucas2005 or qwertydoctor4. He also stated he did not recognize the email addresses associated with the Snapchat usernames, jakepratt18@gmail.com and qwertydoctor4@gmail.com, respectively. WORLEY stated that his Snapchat username is aidanpworley and that he recently changed his Snapchat username from something similar to "doctorwho45."

37. WORLEY stated he uses social media and dating applications to chat message with a lot of different people. WORLEY stated that he does not chat with minors. WORLEY frequently sends chat messages about sexual acts and said he has kinks that include family sexual fantasy role play, sex with married couples (Swingers), and BDSM. WORLEY stated he knows the difference between adult pornography and child pornography. WORLEY knows child pornography is illegal and stated that he watched child pornography one (1) time in high school. WORLEY said the child pornography made him sick and he had to see a therapist. WORLEY

stated that there will not be any evidence related to the investigation on his cell phone.

38. After the execution of the search warrant and interview, law enforcement arrested WORLEY and transported him for booking. During a booking counter search at Bayview Station, an SFPD officer located a Google Pixel cell phone in Aidan WORLEY's shoe. The Google Pixel was seized and retained as evidence.

39. A search of the Google Pixel phone revealed WORLEY was in possession of 5 nude images of children, 7 nude images of children engaged in sex acts, and one video, 1 minute 39 seconds in length, that depicts a minor female (estimated age 13-15) engaging in a sex act with a male (estimated age 7-9).

CONCLUSION

40. Based on the foregoing, there is probable cause to believe that **AIDAN PATRICK WORLEY** violated Title 18, United States Code § 2422(b), coercion and enticement of a minor on or about and in between June 2020 and August 2022, in the Northern District of California.

I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

/s/ *Alexa Leisure*

Alexa Leisure, Special Agent
Homeland Security Investigations

SWORN AND SUBSCRIBED TO BEFORE ME

TELEPHONICALLY THIS 6th DAY OF July, 2023.



ALEX G. TSE
United States Magistrate Judge